

United States Courts Southern  
District of Texas  
FILED

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

*April 14, 2021*

Nathan Ochsner, Clerk of Court

**TAISHA GIVENS**

**Petitioner,**

**v.**

**LAKEFAIR REALTY AND PROPERTY  
MANAGEMENT**

**Respondent,**

**FEDERAL COURT**

**CASE NO.: 4:21cv1247**

**STATE COURT**

**CASE NO.: 215200040674**

**PETITION FOR REMOVAL AND FEDERAL STAY OF EVICTION  
PURSUANT TO 28 USC 1441 (B)**

DEFENDANT, TAISHA GIVENS, hereby files this Petition for Removal in the United States District Court for the Southern District of Texas, Houston Division of the above stated case number, in the State Court of Harris County Texas in accordance with the provisions of Title 28 U.S.C. 1441(b) Judiciary and Procedure. The proceedings occurring in violation of the Uniform Commercial Code of 15 U.S.C. 1692 with unlawful eviction proceedings. Pursuant to the provisions of Title 28 U.S.C. Section 1441(b) the State Court of Harris County shall not proceed with any eviction against the petitioner until it is remanded or so ordered from the United States District Court.

RESPONDENT, Lakefair Realty and Property Management is registered and headquartered in the State of Texas and is attempting to collect a debt in violation of the Fair Debt Collection Practices Act (FDCPA), of 1978, 15 U.S.C. 1692. The Respondent

is also attempting to evict in violation of the Centers for Disease Control's (CDC) Order effectively halting evictions through June 30, 2021. Accordingly, this action is removable pursuant to 28 U.S.C. 1441(b). The United States Court for the Southern District of Texas, Houston Division has jurisdiction over this action pursuant to 28 U.S.C. 1331 and 28 U.S.C. 1367(a).

A copy of all process, pleadings and orders served upon defendant in the state court action is attached hereto as Exhibit "A".

WHEREFORE, DEFENDANT, TAISHA GIVENS requests that this action be removed to the United States District Court for the Southern District of Texas.

Respectfully submitted,



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TAISHA GIVENS  
PRO SE PETITIONER

**Taisha Givens**  
**10311 Marble Meadow Ct**  
**Cypress, TX 77433**